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THEODORE SACHS
1928-2001

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
2004 FEB 9 A 9:02
ROBERT G. HODGES
RONALD S. WEBER
JAMES M. MONROE
D. BRUCE BEADON
OF COUNSEL

February 1, 2006

by facsimile & first class mail

General Counsel's Office
FEC
999 E St. NW
Washington D.C. 20463
Attn: Jeff S. Jordan, Supervisory Attorney

RE: MUR 5696

Dear Mr. Jordan:

This letter constitutes the response of Michael H.R. Buckles and Geraldine Buckles to the above complaint. The complaint has no merit and should be dismissed, because no contributions in excess of the \$2,000 limit were made. This response is supported by the attached Affidavits of Michael and Geraldine Buckles and public filings.

Michael Buckles and Geraldine Buckles each made a contribution for the primary campaign in the amount of \$2,000 to John Kerry for President, on April 20, 2004. The contributions were made by credit card, in response to a solicitation. The contributions were reported by Kerry for President.

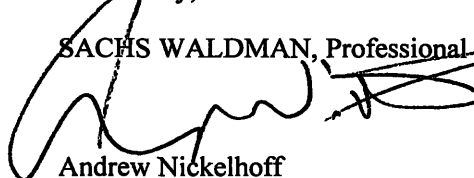
On August 19, 2004, Michael and Geraldine Buckles each made a \$2,000 contribution to the Kerry-Edwards 2004 General Election Legal and Accounting Compliance Fund ("GELAC"), also by credit card in response to a solicitation. Kerry for President reported the August 19, 2004 contributions as designated for the GELAC. (See excerpt from September monthly report, Schedule A, attached) For reasons unknown to the respondents, the memo transfers to the GELAC were not made until September 30, 2004. (See, attached GELAC October monthly report, Schedule A)

The April 20, 2004 contribution was the only contribution each respondent made to Kerry for President. The August 19, 2004 contribution was the only contribution each respondent made to the GELAC. These contributions were within the FECA limits. While the contributions and memo transfer were reported as three transactions, the Buckles each made only one \$2,000 contribution to the Kerry primary campaign and one \$2,000 contribution to the GELAC.

Please contact me should you have any question or if you require additional information regarding this matter.

Yours truly,

SACHS WALDMAN, Professional Corporation



Andrew Nickelhoff

cc: Michael & Geraldine Buckles
O:\General\Nickelhoff\Individuals\Buckles\FECresponse.wpd

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24991238266

**SCHEDULE A
ITEMIZED RECEIPTS**Use separate schedule(s)
or each category of the
Detailed Summary Page

FOR LINE NUMBER PAGE 2458 / 5037

(check only one)

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| <input type="checkbox"/> 16 | <input checked="" type="checkbox"/> 17a | <input type="checkbox"/> 17b | <input type="checkbox"/> 17c | <input type="checkbox"/> 17d | <input type="checkbox"/> 18 |
| <input type="checkbox"/> 19a | <input type="checkbox"/> 19b | <input type="checkbox"/> 20a | <input type="checkbox"/> 20b | <input type="checkbox"/> 20c | <input type="checkbox"/> 21 |

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (In Full)

John Kerry for President, Inc

| | | |
|---|--|---|
| A Full Name (Last, First, Middle Initial) Geraldine Buckles Mailing Address 18910 Locherbie City State Zip Code Beverly Hills MI 48025 FEC ID number of contributing federal political committee Name of Employer Buckles & Buckles PLC Occupation Attorney Receipt For: 2004 X Primary General Other (specify) <input type="checkbox"/> Election Cycle-to-Date <input type="checkbox"/> 2000 00 | | Date of Receipt 08 19 2004 Amount of Each Receipt this Period 2000 00 Designated GELAC Transaction ID: 2238321 |
| B. Full Name (Last, First, Middle Initial) Michael Buckles Mailing Address 18910 Locherbie City State Zip Code Beverly Hill MI 48025 FEC ID number of contributing federal political committee Name of Employer Buckles & Buckles PLC Occupation Attorney Receipt For: 2004 X Primary General Other (specify) <input type="checkbox"/> Election Cycle-to-Date <input type="checkbox"/> 2000 00 | | Date of Receipt 08 19 2004 Amount of Each Receipt this Period 2000 00 Designated GELAC Transaction ID: 2238322 |
| C. Full Name (Last, First, Middle Initial) Donald Dann Mailing Address 60 Ravinoaks LN City State Zip Code Highland IL 60035 FEC ID number of contributing federal political committee Name of Employer Self Occupation Conservationist Receipt For: 2004 X Primary General Other (specify) <input type="checkbox"/> Election Cycle-to-Date <input type="checkbox"/> 250 00 | | Date of Receipt 08 19 2004 Amount of Each Receipt this Period 250 00 Designated GELAC Transaction ID: 2238304 |
| SUBTOTAL of Receipts This Page (optional) | | 4250.00 |
| TOTAL This Period (last page this line number only) | | |

FEC Schedule A (Revised 1/2001)

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SCHEDULE A
ITEMIZED RECEIPTSUse separate schedule(s)
or each category of the
Detailed Summary PageFOR LINE NUMBER PAGE 701 / 842
(check only one)

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| <input type="checkbox"/> 19a | <input type="checkbox"/> 19b | <input type="checkbox"/> 20a | <input type="checkbox"/> 20b | <input type="checkbox"/> 20c | <input type="checkbox"/> 21 |

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (In Full)

Kerry-Edwards 2004, Inc General Election Legal and Accounting Compliance Fund

| | | | |
|---|-------------------|------------------------------------|--|
| Full Name (Last, First, Middle Initial) | | Date of Receipt | |
| A. <u>Gendine Buckles</u> | | 09 / 30 / 2004 | |
| Mailing Address | | Amount of Each Receipt this Period | |
| 18910 Locherbie | | 2000 00 | |
| City | State Zip Code | | |
| Beverly Hills | MI 48025 | | |
| FEC ID number of contributing federal political committee | | | |
| Name of Employer | | [MEMO ITEM] Transfer Memo | |
| Buckles & Buckles PLC | | | |
| Occupation Attorney | | | |
| Receipt For | | Transaction ID: SA67D1 | |
| Primary | General | | |
| Other (specify) ▼ | | | |
| | | 2000 00 | |
| Full Name (Last, First, Middle Initial) | | Date of Receipt | |
| B. <u>Michael Buckles</u> | | 09 / 30 / 2004 | |
| Mailing Address | | Amount of Each Receipt this Period | |
| 18910 Locherbie | | 2000 00 | |
| City | State Zip Code | | |
| Beverly Hills | MI 48025 | | |
| FEC ID number of contributing federal political committee | | | |
| Name of Employer | | [MEMO ITEM] Transfer Memo | |
| Buckles & Buckles PLC | | | |
| Occupation Attorney | | | |
| Receipt For | | Transaction ID: SA67D2 | |
| Primary | General | | |
| Other (specify) ▼ | | | |
| | | 2000 00 | |
| Full Name (Last, First, Middle Initial) | | Date of Receipt | |
| C. <u>John Kerry for President Inc</u> | | 09 / 30 / 2004 | |
| Mailing Address | | Amount of Each Receipt this Period | |
| 901 15th Street, NW | | 28170 00 | |
| City | State Zip Code | | |
| Washington | DC 20005 | | |
| FEC ID number of contributing federal political committee | | | |
| CD0383853 | | | |
| Name of Employer | | Transaction ID: C1873 | |
| Occupation | | | |
| | | | |
| Receipt For | | | |
| Primary | 2004 X General | | |
| Other (specify) ▼ | | | |
| | | 2383363 98 | |
| SUBTOTAL of Receipts This Page (optional) | | 28170.00 | |
| TOTAL This Period (last page this line number only) | | | |

FEC Schedule A (Revised 1/2001)

AFFIDAVIT OF GERALDINE BUCKLES

STATE OF MICHIGAN)
) ss.
COUNTY OF OAKLAND)

GERALDINE BUCKLES, having been duly sworn, states as follows:

1. I make this affidavit from personal knowledge and my statements are true and accurate to the best of my knowledge, information and belief.
2. On or about April 20, 2004, my husband Michael and I each made a contribution in the amount of \$2,000 to John Kerry for President. We made these contributions using a credit card, in response to a solicitation.
3. On or about August 19, 2004, my husband and I each made a contribution in the amount of \$2,000 to the Kerry-Edwards 2004 General Election Legal and Accounting Compliance Fund ("GELAC"). These contributions also were made using a credit card, in response to a solicitation. Our understanding at the time was that these contributions could be made to the GELAC because we had already given the maximum amount to the John Kerry committee during the primary.
4. My husband and I did not make any contributions to John Kerry for President or the GELAC on September 30, 2004.
5. My husband and I did not make any contributions to John Kerry for President or the GELAC after August 19, 2004. We did not make any contributions to those committees other than the contributions described in paragraphs 2 and 3 above.

FURTHER AFFIANT SAYETH NOT.


GERALDINE BUCKLES

Subscribed and sworn to before me
this 30 day of January, 2006.

Michelle A Chase (Michelle A Chase)
NOTARY PUBLIC, Oakland COUNTY, MI.
My Commission Expires: 8/12/07

MICHELLE ANN CHASE
NOTARY PUBLIC OAKLAND CO., MI
MY COMMISSION EXPIRES Aug 12, 2007

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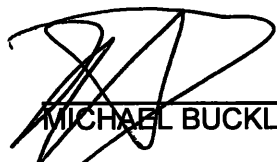
AFFIDAVIT OF MICHAEL BUCKLES

STATE OF MICHIGAN)
) ss.
COUNTY OF OAKLAND)

MICHAEL BUCKLES, having been duly sworn, states as follows:

1. I make this affidavit from personal knowledge and my statements are true and accurate to the best of my knowledge, information and belief.
2. On or about April 20, 2004, my wife Geraldine and I each made a contribution in the amount of \$2,000 to John Kerry for President. We made these contributions using a credit card, in response to a solicitation.
3. On or about August 19, 2004, my wife and I each made a contribution in the amount of \$2,000 to the Kerry-Edwards 2004 General Election Legal and Accounting Compliance Fund ("GELAC"). These contributions also were made using a credit card, in response to a solicitation. Our understanding at the time was that these contributions could be made to the GELAC because we had already given the maximum amount to the John Kerry committee during the primary.
4. My wife and I did not make any contributions to John Kerry for President or the GELAC on September 30, 2004.
5. My wife and I did not make any contributions to John Kerry for President or the GELAC after August 19, 2004. We did not make any contributions to those committees other than the contributions described in paragraphs 2 and 3 above.

FURTHER AFFIANT SAYETH NOT.


MICHAEL BUCKLES

Subscribed and sworn to before me
this 30 day of January, 2006.

Michelle A Chase (Michelle A Chase)
NOTARY PUBLIC, Oakland COUNTY, MI.

My Commission Expires: 8/12/07

O:\General\Nickelhoff\Individuals\Buckles\mbuckles affid.wpd

MICHELLE ANN CHASE
NOTARY PUBLIC OAKLAND CO., MI
MY COMMISSION EXPIRES Aug 12, 2007

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